## REMARKS

By this Amendment, Applicants amend claims 1, 6, 7, 9, 10, 13, 18, 20-22, and 25-36. Support for the amendments can be found in the specification at, for example, paragraphs 002, 005, 008, 010, 035, 042, 055, and 073. Claims 1-36 are pending.

In the Office Action,[1] the Examiner rejected claims 1-36 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,275,223 to Hughes ("*Hughes*") in view of U.S. Patent No. 6,584,479 to Chang et al. ("*Chang*"), U.S. Patent No. 6,195,094 to Celebiler ("*Celebiler*"), and U.S. Patent No. 7,490,292 to Hennum ("*Hennum*").

### I.    Information Disclosure Statement

Applicants note that the Examiner did not acknowledge receipt and consideration of the Supplemental Information Disclosure Statement (IDS), filed March 30, 2009. Applicants respectfully request that the Examiner consider the listed documents in the IDS and return an initialed copy of the IDS Form PTO/SB/08.

### II.   Rejection of Claims 1-36 under 35 U.S.C. § 103(a)

Applicants respectfully traverse the rejection of claims 1-36 under 35 U.S.C. § 103(a). A *prima facie* case of obviousness has been established.

"The key to supporting any rejection under 35 U.S.C. § 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious." M.P.E.P. § 2141(III). "[T]he framework for objective analysis for determining

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

obviousness under 35 U.S.C. § 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). . . . The factual inquiries . . . are as follows:

(A) [Determining the scope and content of the prior art;]

(B) Ascertaining the differences between the claimed invention and the prior art; and

(C) Resolving the level of ordinary skill in the pertinent art."

M.P.E.P. § 2141(II). "Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art." M.P.E.P. § 2141(III).

Independent claim 1 recites a method comprising, for example, "providing an application including a pattern based user interface . . . developed by reusing predefined user interface components . . . [and] a non-pattern pattern based user interface . . . developed by editing a source code of the non-pattern based user interface[,] . . . wherein the pattern based user interface and the non-pattern based user interface are displayed together in a window."

The Examiner cites menu tool bar 701 of *Hughes* as teaching "a pattern based user interface." Office Action, p. 3. This is incorrect. *Hughes* discloses "a main window display 700 . . . comprises a menu tool bar 701 having a set of drop down menus . . . compris[ing] a file menu icon 704, a source menu icon 705 and a timer menu icon 706." *Hughes*, col. 10, ll. 24-32. However, *Hughes* does not disclose or suggest that menu tool bar 701 was "developed by reusing predefined user interface components," as recited in claim 1. Indeed, *Hughes* is completely silent with respect to how menu tool

bar 701 was developed. Therefore, menu tool bar 701 of *Hughes* cannot teach or suggest the claimed "pattern based user interface." For at least these reasons, *Hughes* fails to teach or suggest "providing an application including a pattern based user interface . . . developed by reusing predefined user interface components," as recited in claim 1.

Furthermore, the Examiner cites first display window 702, second display window 703, and main window 1701 of *Hughes* as teaching "a non-pattern based user interface." Office Action, p. 3. This is incorrect. *Hughes* discloses that "a main windows display 700 . . . comprises . . . a first display window 702 for display of original source code[] and a second display windows 703 for display of new source code." *Hughes*, col. 10, ll. 24-30. *Hughes* further discloses "a window box display 1700 having a main window 1701 in which lines of source code are displayed." *Id.*, col. 14, ll. 8-9. However, *Hughes* does not disclose or suggest that first display window 702, second display window 703, or main window 1701 was "developed by editing the source code of the non-pattern based user interface," as recited in claim 1. Indeed, *Hughes* is completely silent with respect to how first display window 702, second display window 703, and main window 1701 were developed.

Moreover, *Hughes* discloses only <u>displaying</u> source code, but does not disclose or suggest "<u>editing</u> a source code," as recited in claim 1. *Hughes* discloses, at best, editing annotations to the source code. *See Hughes*, col. 15, ll. 12-13. Furthermore, *Hughes* does not disclose that the source codes being displayed in first display window 702, second display window 703, and main window 1701 are the source codes <u>of</u> the

display window 702, the second display window 703, and the main window 1701, respectively. Therefore, none of display window 702, second display window 703, and main window 1701 of *Hughes* teaches or suggests the claimed "non-pattern based user interface." For at least these reasons, *Hughes* fails to teach or suggest "providing an application including . . . a non-pattern pattern based user interface . . . developed by editing a source code of the non-pattern based user interface," as recited in claim 1.

In addition, because *Hughes* fails to disclose the claimed "pattern based user interface" and "non-pattern based user interface," *Hughes* also fails to teach or suggest "the pattern based user interface and the non-pattern based user interface are displayed together in a window," as recited in claim 1.

*Chang, Celebiler,* and *Hennum* disclose several user interfaces. However, *Chang, Celebiler,* and *Hennum* are completely silent with respect to whether the disclosed user interfaces were "developed by reusing predefined user interface components" or "developed by editing a source code of the . . . user interface," as recited in claim 1. Therefore, none of the user interfaces in *Chang, Celebiler,* and *Hennum* teaches or suggests the "pattern based user interface" and "non-pattern based user interface" of claim 1. And, as a result, *Chang, Celebiler,* and *Hennum* fail to teach or suggest "the pattern based user interface and the non-pattern based user interface are displayed together in a window," as recited in claim 1. *Chang, Celebiler,* and *Hennum* thus fail to cure the deficiencies of *Hughes.*

For at least the foregoing reasons, the scope and content of the prior art have not been properly determined, and the differences between the prior art and claim 1 have

not been properly ascertained. Moreover, the Office Action has not identified any factors that would motivate one of ordinary skill in the art to modify the teachings of the prior art to achieve the claimed combination. Accordingly, no reason has been clearly articulated as to why the prior art would have rendered claim 1 obvious to one of ordinary skill in the art. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 1.

Independent claims 13 and 25, although different in scope from claim 1, are allowable for at least reasons similar to those presented above with respect to claim 1. Dependent claims 2-12, 14-24, and 26-36 are allowable at least due to their dependence from an allowable independent claim. Accordingly, Applicants respectfully request that the Examiner withdraw the rejection of claims 1-36 under 35 U.S.C. § 103(a).

## CONCLUSION

Applicants respectfully request that the Examiner enter the amendments under 37 C.F.R. § 1.116, placing the pending claims in condition for allowance. Applicants submit that the amendments do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner. Therefore, this response should allow for immediate action by the Examiner.

Applicants further submit that the entry of the amendments would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing, Applicants respectfully request reconsideration of this application and timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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